UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via U.S. Postal Service and Electronic Mail
Certified Mail Receipt No. 7008 1830 0002 6279 5332
Return Receipt Requested

April 7, 2011

Spence Leslie
Director
Tyco Thermal Controls
307 Constitution Drive
Menlo Park, California 94025

Re: Former Tyco Thermal Controls Facility in Redwood City, California – Revised Work Plan Additional Paint Sampling Locations and Pilot Test - Building Demolition Pre-Implementation of Toxic Substances Control Act PCB Cleanup Approval

Dear Mr. Leslie:

This letter responds to the March 28, 2011[1], March 9, 2011 letter[2], and March 3, 2011 letters[3] sent by GRA Associates, Inc. (GRA) to the U.S. Environmental Protection Agency Region 9 (USEPA) on behalf of Tyco Thermal Controls (TTC). The March 28 letter summarizes additional sampling of building materials (e.g., paint, ceiling tiles) before demolition of the former Tyco Thermal Controls facility building at 2201 Bay Road, Redwood City, California (Tyco). GRA's March 9 letter proposed additional sampling of building materials and that proposal is revised in GRA's March 28 letter. GRA's March 3 letter responded to USEPA's February 15, 2011 e-mail message with comments on sampling of building materials associated with the planned demolition of the Tyco facility building.

In December 2010, USEPA requested a copy of TTC's Decommissioning and Demolition Plan (DDP) to ensure that TTC is taking steps to identify PCBs in building materials before demolition of the Tyco-facility building and to properly segregate PCB bulk product waste (if present) for disposal in accordance with 40 CFR 761.62. The former Tyco facility building which is approximately 2 acres was constructed in 1955 and expanded several times between 1955 and 1974.

This letter responds to the following issues associated with GRA's letters and the Decommissioning and Demolition Plan (DDP):

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[1] March 28, 2011 Letter from George Reid (GRA Associates Inc.) to Carmen D. Santos (USEPA Region 9) (Subject: *"Revised Work Plan Additional Paint Sampling Locations and Pilot Test Tyco Thermal Controls Building, 2201 Bay Road, Redwood City, California"*).

[2] March 9, 2011 Letter from George Reid (GRA and Associates, Inc.) to Carmen D. Santos (USEPA Region 9) (Subject: *"Work Plan Additional Paint Sampling and Demonstration Pilot Test of PCB-Abatement Methods Tyco Thermal Controls Building, 2201 Bay Road, Redwood City, California"*).

[3] March 3, 2011 Letter from George Reid (GRA and Associates, Inc.) to Carmen D. Santos (USEPA Region 9) (Subject: *"Responses to Comments from USEPA, C. Santos E-Mail, Feb. 15, 2011 Tyco Thermal Controls Building, 2201 Bay Road, Redwood City, California"*).

- USEPA concurrence on additional sampling of building materials,
- Pilot study to decontaminate interior surfaces in the Tyco building before demolition,
- PCB bulk product waste,
- PCB remediation waste, and
- Compressor oil disposal and storage of PCB-containing waste.

USEPA Concurrence on Additional Sampling of Building Materials

On March 24, 2011, USEPA toured the Tyco facility and based on observations made during that tour, additional samples of building materials (e.g., paint, ceiling tiles) will be collected. GRA's March 28 letter includes these samples and those originally proposed in GRA's March 9 letter. USEPA concurs with the additional sampling of building materials at the former Tyco facility proposed in the March 28 letter. However, if not already included in the March 28 summary of additional samples, the paint samples described in the March 3 letter to be collected from the flame chamber must be added to the samples that GRA has proposed in its March 28 letter.

Regarding sampling of non-porous (e.g., metal) and porous surfaces (e.g., concrete, metal coated with paint), enclosed are the *"Wipe Sampling and Double Wash/Rinse Cleanup As Recommended by the Environmental Protection Agency PCB Spill Cleanup Policy"* (dated June 23, 1987, revised April 18, 1991, prepared by USEPA) and *"Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs)"* (dated July 22, 2008 and prepared by USEPA Region 1). We recommend the procedures in these guidance documents be used to collect some of the proposed samples.

Pilot Study to Decontaminate Interior Surfaces in the Tyco Building before Demolition

In addition to other information, the DDP includes a proposal under 40 CFR 761.79(h) to decontaminate the building interior before demolition. The interior surfaces (e.g., painted concrete, painted wood) of the building are impacted by PCB-containing dust. USEPA requested that this proposal be resubmitted as an application for alternative decontamination in accordance with the requirements in 40 CFR 761.79(h) separate from the DDP.

GRA's March 28 letter describes in more detail the pilot study to demonstrate the effectiveness of alternative decontamination procedures that GRA proposes to use for surfaces inside the building and an application will be submitted in accordance with 40 CFR 761.79(h). We clarify, however, that this pilot study is not a substitute for the samples that must be collected from the interior building surfaces after these are decontaminated to verify decontamination levels. The pilot study is to support the application for alternative decontamination procedures and must demonstrate that GRA's proposed procedures are effective in removing PCB-containing dust from surfaces inside the building. USEPA will review the application for approval together with the supporting pilot study and related pilot-study results accompanying the application.

PCB Bulk Product Waste

Depending on the PCB levels in the tested building materials such as paint, ceiling tiles, and wiring insulation, these materials, if containing PCB concentrations equal to or above 50 mg/kg, must be disposed offsite as PCB bulk product waste in accordance with the requirements in 40 CFR 761.62. If PCB levels in the building materials are below 50 mg/kg, USEPA will make a determination as to whether USEPA would regulate those materials for disposal under TSCA. Materials designated as PCB bulk product waste are materials manufactured with PCBs or

contaminated with PCBs during manufacture. For painted surfaces such as painted concrete or painted wood, if the paint containing PCBs equal to or above 50 mg/kg has adhered to the substrate, those surfaces must be disposed as PCB bulk product waste.

PCB Remediation Waste

On January 4, 2011, USEPA approved with conditions the TTC June 14, 2010 *"PCB Cleanup Notification and Work Plan Tyco Thermal Controls 2201 Bay Road, Redwood City, California,"* prepared by AMEC Geomatrix for TTC. In addition to many other conditions, the conditional approval involves removal and off-site disposal of the PCB-contaminated concrete slab and associated below ground structures. Before conducting additional site characterization sampling and implementing the PCB cleanup plan at the former Tyco facility, TTC will demolish the 2-acre facility building except for the concrete slab, which will be removed during the PCB cleanup. Upon removal, the PCB-contaminated concrete slab will be disposed offsite as PCB remediation waste.

Compressor Oil Disposal and Storage of PCB Containing Waste

The crankcase oil in the air compressors at the Tyco building may contain PCBs. We understand that oil from several inactive compressors was drained into containers. If waste oil has already been comingled, we recommend that wipe samples be collected from the interior of the air compressors that supplied the oil to estimate the PCB concentration if sufficient oil volume is not available to take a representative oil sample from each compressor for analysis. Any drained oil maintained in a container must be tested for PCBs; and the PCBs managed at the concentration of the highest individual source of the comingled oil. If the PCB concentration in the oil is equal to or above 50 mg/kg, TTC must comply with the storage requirements in 40 CFR 761.65(c)(1)(iv).

Depending on the PCB concentration in the crankcase oil, the oil may be disposed of in accordance with the requirements in 40 CFR 761.60, or if the oil contains less than 2 mg/kg PCBs, such oil may be marketed and ultimately burned as oil for energy recovery subject to the requirements in 40 CFR 761.20(e). Oil containing PCBs is also separately regulated by the state of California through the Department of Toxic Substances Control (DTSC), and those requirements must also be met.

We look forward to receiving and approving the TTC application for alternate decontamination under 40 CFR 761.79(h). Please call Carmen Santos at 415.972.3360 if you have any questions concerning this letter.

Sincerely,

Steve Armann, Manager
RCRA Corrective Action Office
Waste Management Division

Enclosures (2)

Cc's Via E-Mail:
George Reid (GRA and Associates, Inc.)

Lenard D. Long, SCS Engineers
Ed Firestone, The Stanzler Law Group
Ivan Lieben, USEPA R9, ORC
Steve Armann, USEPA R9
Carmen Santos, USEPA R9